

From: [Gary Moore](#)
To: [stephen.halasz](#)
Subject: Re: Falcon refinery
Date: 01/08/2003 01:25 PM

Steve:

We have told them that they can go forward and begin the actions that we discussed with them. NORCO owns the property and we cannot prevent them from going ahead and doing work on the property unless we get a court order. I think it benefits everyone for them to go ahead and continue the work while we negotiate an AOC with them. Regardless, of whether the work is done with or without an AOC, they still have to comply with all of the local, State, and Federal regulations. In addition, I would add that they should also probably contact us to insure that they are sending the waste generated to a CERCLA acceptable facility. Under the AOC, this will be a requirement. They will be required to comply with the Off-Site Disposal Rule. Basically, these are TSD's that have indicated to EPA that they would like to accept CERCLA facility wastes and meet the requirements of the CERCLA Off-Site Rule. EPA does not maintain a list of these facilities but how it works is that I have to give the Off-site Disposal Coordinator the name of the facility and the EPA Site ID and (s)he checks to see that the facility has requested CERCLA authorization and are compliant according to the rule.

If you have any questions, please let me know.

Gary Moore
EPA Region 6
Response and Prevention Branch
214-665-6609
moore.gary@epa.gov
▼ [stephen.halasz <shalasz@bnceng.com>](mailto:stephen.halasz@bnceng.com)

stephen.halasz
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To: Gary Moore/R6/USEPA/US@EPA
cc:
Subject: Re: Falcon refinery

01/08/2003 11:30 AM

We will be preparing the RAW and the RI/FS. Have you authorized any field activities? We've been told that you have approved some removal activities despite the fact that a RAW has not been prepared.

Stephen Halasz
BNC Environmental Services, Inc.
607 River Bend Drive
Georgetown, TX 78628
(512) 930-1535 ext.223

----- Original Message -----
From: <Moore.Gary@epamail.epa.gov>



9567993

To: "stephen halasz" <shalasz@bnceng.com>
Sent: Wednesday, January 08, 2003 11:12 AM
Subject: Re: Falcon refinery

>
> Steve:
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> We have not entered into an Administrative Order
on Consent with NORCO
> as of yet. In fact our legal people have not even
got a draft prepared
> as of yet to send to NORCO to begin the
negotiations. What do you know
> about the progress being made? What do you
expect BNC's role will be
> relative to the site?

>
> Gary Moore
> EPA Region 6
> Response and Prevention Branch
> 214-665-6609
> moore.gary@epa.gov

>
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>
> stephen halasz
> <shalasz@bnceng.c

To: Gary
Moore/R6/USEPA/US@EPA
> om>

cc:

>
Subject: Falcon refinery
> 01/06/2003 08:08
> AM
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>
> We've talked in the past about the Falcon Refinery
in Ingleside, have
> you issued an agreed order for the RAW?

>
> Stephen Halasz
> BNC Environmental Services, Inc.
> 607 River Bend Drive
> Georgetown, TX 78628
> (512) 930-1535 ext.223

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